

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)

UNITED STATES OF AMERICA

\*

VS.

\*

CASE NO. CCB 20-015

TAMUFOR ST. MICHAEL

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**CONSENT MOTION TO AUTHORIZE TRAVEL**

The Defendant by and through his Attorney, Robert C. Bonsib, Esq. respectfully requests this Honorable Court to authorize travel in the above captioned matter and, as reasons therefore, states as follows:

1. The Defendant has been indicted in the above captioned matter on the charge of exporting firearms.
2. The Defendant has been on pre-trial release since 2019 and has been compliant with all terms and conditions of his pre-trial release. The Defendant has been granted travel permission on prior occasions to visit family out-of-state and has followed all requirements during his travel.
3. The Defendant wishes to travel to Allentown, Pennsylvania during the period of January 17-19, 2022 to visit his wife who is presently residing in Allentown, Pennsylvania.
4. Assistant United States Attorney, Kathleen Gavin, has authorized undersigned counsel to represent that the government has no objection to this request.
5. The Defendant will advise the Pretrial Services Office of his specific travel itinerary prior to his travel.

WHEREFORE it is respectfully requested that this Honorable Court grant the relief prayed.

Respectfully submitted,

*/s/ Robert C. Bonsib*

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Trial Bar No. 00324

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was sent via first class mail, this 11th day of January, 2022 to Assistant United States Attorney Kathleen Gavin, Office of the United State's Attorney for the District of Maryland.

*/s/ Robert C. Bonsib*

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ROBERT C. BONSIB